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FEDERAL COMMUNICATIONS CONSULTING ENGINEERS
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 28, 1993

Mr. William Caton, Secretary
Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20554

Re: MM Doc.No. 93-177
RM-7594

Dear Mr. Caton:

Transmitted herewith for filing with the FCC are the original and four copies of the comments of AFCCE in the above referenced matter. Also enclosed is an additional "return copy" and stamped addressed envelope. Please mail an FCC date stamped copy in this envelope for our records.

If any questions arise in this matter, please contact the undersigned.

Sincerely,

Robert D. Culver, AFCCE President
c/o Lohnes and Culver
8309 Cherry Lane
Laurel, Md. 20707-4830
301-776-4488

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

An Inquiry into the Commission's) RM-7594
Policies and Rules regarding AM)
Radio Service Directional Antenna)
Performance Verification)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

93-177

COMMENTS OF THE ASSOCIATION OF
FEDERAL COMMUNICATIONS CONSULTING ENGINEERS
FCC NOTICE OF INQUIRY

The Association of Federal Communications Consulting Engineers (AFCCE) is an organization that includes approximately 80 full members, who are registered professional engineers engaged in the practice of consulting engineering or are communication company engineering executives, together with approximately 120 associate and other members, most of whom are engineers employed by equipment manufacturers.

AFCCE was organized in 1948 and has, for over four decades, been pleased and honored to share its professional experience and insight with the Federal Communications Commission.

AFCCE supports the goal that the FCC Rules should, from time to time, be revisited in light of new technical advances in the art of communication. The resulting revision of the Rules, if any, should result in the more efficient regulation and operation of the industry. The Commission and industry should, however, keep in mind the basic premise under which the Rules are used, to provide communication services to society. That service is founded on the most basic of rules, governing technical operations, modification of which should be approached with care.

FCC Docket 93-177 is a NOTICE OF INQUIRY (NOI) into the revision of the AM Rules. It is styled "In the broadest sense..." and "...seeks to identify those portions of the current rules affecting AM directional arrays which ought to be the subject of a Notice of Proposed Rulemaking" (NOI at 7). As such, it is appropriate that the recommendations

presented to any Notice of Proposed Rulemaking (NPRM) first be derived from a very broad based discussion of the many interrelated topics outlined in this NOI.

The AM technical rules are designed to provide for service to principal communities and to prevent interference between operations. Proposals to modify the Rules should keep this basic premise in mind. If a particular technical point is proposed to be modified, such as certifying directional antenna pattern performance by theoretical parameters without field measurement, and that change could impact the basic premise, it should be considered at length and with great caution. This is an example of only one topic listed in the NOI, but a topic which is highly related to many of the other topics listed, such as; type of instrumentation, physical measuring procedure, tolerances of operation and measurement, instrument calibration, documentation, etc.

The interrelation of the many topics in this NOI generates a decision process with many degrees of freedom, requiring considerable discussion to resolve the issues. Within AFCCE, the discussion of the NOI over the past weeks has generated many diverse opinions and suggestions on the potential changes. To resolve these differences it is necessary that broad topics be the subject of a continuous FCC/Industry review process, by a panel of experts working over many months, and not limited to as few as two rounds of comments and reply comments in the NOI-NPRM process. These multiple and interrelated topics demand a thorough review. Some of the proposed changes could seriously affect the basic service premise of AM broadcasting and the FCC should be in no hurry to adopt such changes without thorough review. AFCCE supports an FCC sponsored industry wide dialogue, similar to the ATV Advisory Panel, focusing on the AM technical rules. The panel would present its findings to the FCC in preparing a Notice of Proposed Rule Making.

Respectfully submitted,

by: 

Robert D. Culver, P.E.
AFCCE President

October 28, 1993